



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/JDG/CMP
F.#2008R00530

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 1, 2012

By ECF and Email

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Re: United States v. Thomas Gioeli, et al.
Criminal Docket No. 08-240 (BMC)

Dear Counsel:

Pursuant to Brady v. Maryland, 373 U.S. 83 (1963), the government hereby makes the following disclosure in the above-captioned case.

| <u>EXHIBIT</u> | <u>DESCRIPTION</u> |
|----------------|--|
| 1421 | NYPD report dated August 26, 1997, listing moving violations and parking summons activity within the confines of the 61 st Precinct |

In addition, pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery in the above-captioned case.

| <u>EXHIBIT</u> | <u>DESCRIPTION</u> |
|-------------------------|---|
| 1422 | Certified deed and other records for 645 10 th Street, West Babylon, NY |
| 1423 | Certified subscriber information and toll records for 3 Frank Avenue, Farmingdale, NY (previously provided without certification) |
| 1424A 1424B 1424C | Three DVDs containing additional video surveillance taken at 2116 Avenue X in Brooklyn on May 8, 1996 |
| 1425A 1425B 1425C | Three DVDs containing additional video surveillance taken at 2116 Avenue X in Brooklyn on May 15, 1996 |
| 1426A 1426B | (A) Surveillance video taken at Torrese Social Club, 2005 West 8 th Street, Brooklyn, New York on April 24, 1999, and (B) excerpts thereof, including footage of Thomas Gioeli |
| 1427 | Excerpted surveillance video taken at Torrese Social Club, 2005 West 8 th Street, Brooklyn, New York on May 3, 1999, including footage of Gioeli |
| 1428 | Excerpted surveillance video taken at Torrese Social Club, 2005 West 8 th Street, Brooklyn, New York on March 8, 1999, including footage of Gioeli |
| 1429 | Citywide Auto Leasing record for "Joseph DeRosa" |
| 1430 | Ballistics report relating to the murder of Ralph Dols |
| 1430 | Photographs provided by Reynold Maragni |

If you have any questions or requests, please
contact us.

Sincerely,

LORETTA E. LYNCH
United States Attorney

By: /s/ Cristina M. Posa
Elizabeth A. Geddes
James D. Gatta
Cristina M. Posa
Assistant U.S. Attorneys

cc: All Counsel (by ECF) (w/o enclosures)
Clerk of the Court (BMC) (by ECF) (w/o enclosures)